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FILED VIA ECF

November 29, 2022

The Honorable Lorna G. Schofield
United States District Court Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Bonifacio Flores-Mendez
13-CR-31-02 (LGS)

Dear Judge Schofield:

This joint letter from the government and the defense is written to respond to two Orders of the Court regarding the resentencing of my client Bonifacio Flores-Mendez, scheduled for January 31, 2023, and to include some additional information.

1. Regarding the Court's Order that the defense advise the Court if Mr. Flores-Mendez should be produced in person or consents to appearing remotely for the resentencing:

Mr. Flores-Mendez told me in a legal call from U.S.P. Hazelton that he wants to appear via video conference rather than in person, because he is concerned that he will not get his twice daily insulin injections on a regular basis while in transit from Hazelton in West Virginia to M.D.C. in Brooklyn. That trip would include in transit stopovers at various other facilities including county jails and detention centers where his required medication may or may not be available on schedule.

BOP staff at Hazelton told me that they do have videoconference capability, but that needs to be set up with the Court in advance. I can give your deputy or law clerk contact information.

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2. Regarding the Court's Order that the parties confer with Probation and file a joint letter proposing special conditions of supervised release:

Both the government and the defense have communicated with the U.S. Probation Office on this subject. The parties received the full text of Probation's special conditions last week and are in general agreement about them. Those proposed special conditions are attached to this letter as Exhibit A.

3. Medical issues: The Government has today obtained from the BOP, at the request of the defense, Mr. Flores-Mendez' most recent medical records so that information on the current status and treatment of his diabetes can be presented to the Court prior to the resentencing in January. With the Court's permission, the defense will review those records in the next week and submit a letter to the Court about Mr. Flores-Mendez' present medical condition by December 13, 2022.

Respectfully submitted,



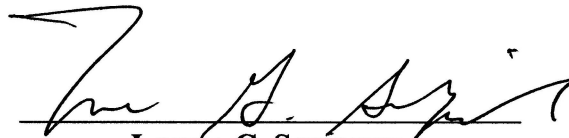
AVROM ROBIN

Attachment

Copy via ECF and email: A.U.S.A. William Kinder

Applications GRANTED. Defendant shall file a letter by **December 13, 2022**, concerning Defendant's present medical condition. The resentencing will be held by videoconference. Defense counsel shall send the contact information required to arrange for a videoconference at U.S.P. Hazelton to the Court by email to schofield_nysdchambers@nysd.uscourts.gov.

Dated: November 30, 2022
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE